

**Kristi Cahoon Kelly**

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**From:** Leonard Bennett [lenbennett@clalegal.com]  
**Sent:** Monday, February 06, 2012 9:54 PM  
**To:** Leonard Bennett  
**Cc:** George Kostel; Vicki Ward; Susan Rotkis; Kristi Cahoon Kelly; Olga Macias  
**Subject:** Re: Sandra Berrios v. Flagstar Bank

Kristi -

Given my neck injury, I was unable to force this noon call. Please follow up with Mr. Kostel and meet and confer regarding his discovery objections. (He has not served any responses or a privilege log). We will file our Motion for Rule 37c1 Sanctions and Motion to Compel by close of day Friday.

George, I am asking that Kristi call you tomorrow at 11 am. If that time is not available, please advise an alternate time.

Len

On Feb 3, 2012, at 5:39 PM, Leonard Bennett wrote:

You have not served any responses to our discovery. There is your letter. I will call you at noon on Monday.

Sent from my iPad

On Feb 3, 2012, at 4:37 PM, George Kostel <[George.Kostel@nelsonmullins.com](mailto:George.Kostel@nelsonmullins.com)> wrote:

Len,  
I've been tied up preparing for a hearing today. I'd be glad to speak on Monday. File what you want but Local Rule 37(E) is interpreted here as an actual conference or at least a letter

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**From:** Leonard Bennett [mailto:[lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)]  
**Sent:** Friday, February 03, 2012 4:27 PM  
**Cc:** Vicki Ward; George Kostel; Susan Rotkis; Kristi Cahoon Kelly; OlgaMacias  
**Subject:** Re: Sandra Berrios v. Flagstar Bank

George -

I have been unable to obtain your return call or joinder in a Rule 37 meet and confer process. We intend to file our motion to compel and rule 37c1 motion on Monday unless we have full discovery answers by Monday at noon.

Len

Sent from my iPad

On Feb 3, 2012, at 3:39 PM, "Royster, Anitra" <[Anitra.Royster@alston.com](mailto:Anitra.Royster@alston.com)> wrote:

Please note that my firm and I withdrew from this matter.  
Thanks.

Anitra G. Royster  
919-862-2280  
[anitra.royster@alston.com](mailto:anitra.royster@alston.com)

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**From:** Vicki Ward [<mailto:vickiward@clalegal.com>]  
**Sent:** Friday, February 03, 2012 3:38 PM  
**To:** [George.Kostel@Nelsonmullins.com](mailto:George.Kostel@Nelsonmullins.com); Royster, Anitra  
**Cc:** Leonard Bennett; Susan Rotkis; Kristi Cahoon Kelly; Olga Macias  
**Subject:** Sandra Berrios v. Flagstar Bank

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Ms. Royster and Mr. Kostel:

Attached hereto please find the following with regard to the above matter:

1. Forwarding letter;
2. 30(b)(6) Deposition Notice;
3. Notice of Deposition of Flagstar's ACDV Operators who processed the Plaintiff's disputes.

The originals will be mailed to you today, as well.

Thanks,

**Vicki Ward, Legal Assistant**  
**CONSUMER LITIGATION ASSOCIATES, P.C.**  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, VA 23601  
Phone - 757-930-3660  
Fax: 757-930-3662  
e-mail: [vickiward@clalegal.com](mailto:vickiward@clalegal.com)

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